



Posted: Wednesday, August 08, 2018

NOTICE AND CALL OF A SPECIAL MEETING OF THE TRINIDAD CITY COUNCIL

The Trinidad City Council will hold a Special Meeting on
THURSDAY, AUGUST 9th, 2018, at 6:00 PM
In the Trinidad Town Hall, 409 Trinity Street, Trinidad, CA

CLOSED SESSION BEGINS AT 5:30PM

- I. **CALL TO ORDER**
- II. **ADJOURN TO CLOSED SESSION**
 - 1. *Conference with Legal Council regarding threatened litigation from Mike Morgan regarding City Manager actions. Pursuant to California Government Code section 54956.9 (a)*
- III. **RECONVENE TO OPEN SESSION – CLOSED SESSION REPORT**
- IV. **PLEDGE OF ALLEGIANCE**
- V. **APPROVAL OF AGENDA**
- VI. **ITEMS FROM THE FLOOR**
 - At this time, members of the public may comment on items NOT appearing on the agenda. Individual comments will be limited to 3 minutes or less. Comments should be directed to the Council as a whole and not to individual Council Members or staff. Council and staff responses will be minimal for non-agenda items.*
- IX. **DISCUSSION/ACTION AGENDA ITEMS**
 - 1. Discussion/Decision Regarding Allegations of Code of Ethics Violations by Planning Commissioner Mike Morgan.
- XI. **ADJOURNMENT**



DISCUSSION AGENDA ITEM 1

SUPPORTING DOCUMENTATION FOLLOWS WITH: 14 PAGES

1. Discussion/Decision Regarding Allegations of Code of Ethics Violations by Planning Commissioner Mike Morgan.

ACTION AGENDA ITEM

Date: August 9th, 2018

Item: Code of Ethics Allegation Against Planning Commissioner Mike Morgan

The City's Code of Ethics for Council and Planning Commissioners (attached) provides that *"Any member may place an allegation of an Ethics Code violation on the City Council agenda, and it shall always be placed first in order on the agenda."*

Councilmember Miller has requested such a discussion regarding the conduct of Planning Commissioner Mike Morgan, related to the June 19th complaint regarding Mr. Morgan, and the information and actions that have followed that complaint.

The initial complaint, and the staff response to it, are attached. Since that response was created, the anonymous person described in the report has identified herself, and reiterated her account and concerns. The Council also heard directly from Mr. Brett Gregory, who stated he witnessed the initial incident.

A second complaint regarding Mr. Morgan's behavior has been filed and is also attached regarding a recent confrontation between Mr. Morgan and Mr. Gregory related to this issue.

Mr. Morgan has also made a complaint (attached) against the City Manager in relation to staff's response to the initial complaint. That is attached.

Staff comments:

Staff are concerned that:

- a) Bringing weapons of any kind to public City meetings is unnecessary and destructive to the goals of fostering positive civic engagement.
- b) Mr. Morgan's response to staff, members of the public, and fellow Commissioners with regard to the initial complaint has resulted in further complaints about his behavior, and generally inflamed the situation rather than helping bring it to any resolution.

Staff recommends the Council:

- a) Disclose and briefly summarize any ex-parte communications they have had related to this agenda item.*
- b) Accept public comment*

c) Provide opportunity (in addition to public comment) for the complainants and Mr. Morgan to speak to the matter and answer any questions the Council may have.

d) Consider what, if any, action is appropriate. Planning Commissioners serve at the pleasure of the Council and the Council has the authority to sanction or even remove Planning Commissioners. Per the Code of Ethics: 'The Council, by at least a 4/5 vote, may impose sanctions on members whose conduct does not comply with the City's ethical standards.'

Attachments:

- 1) Trinidad Code of Ethics for Council and Planning Commissioners
- 2) June 19th complaint re: Mike Morgan and staff response
- 3) August 6th complaint re: Mike Morgan
- 4) Complaint against City Manager by Mike Morgan.



Date: July 7, 2018

From: City Manager Dan Berman

Re: Response to Complaint of June 19th re: Planning Commissioner Mike Morgan

Summary:

On Tuesday June 19th the City received a complaint (attached) regarding the conduct of Planning Commissioner Mike Morgan. The complaint describes two separate incidents: one alleging Mr. Morgan brought a taser or stun gun type weapon to a Planning Commission meeting on May 16th, and one involving Mr. Morgan's public comments at a City Council meeting on June 14th.

Staff (City Manager Berman) conducted a basic investigation of the complaint allegations, the results of which are presented here as a response to the complaint. Some claims in the complaint are verified and some remain in dispute. Staff recommendations at this point are limited to advising the City Council to review this report, and to consider whether to place a discussion of this issue on a future Council agenda.

Findings:

June 14th Public comments:

I was present at the June 14th City Council meeting and can confirm that Mr. Morgan did make the statement quoted in the complaint during public comment. He was criticized for the statement by a member of the Council and members of the public, and he did return to the podium, acknowledge that his comment was inappropriate, and apologize for it.

May 16th Planning Commission meeting

The complaint regarding the May 16th Planning Commission meeting is a third hand account, as the person filing it was not present, and is reporting events witnessed by another party and shared with them. I was not present at the meeting.

Deputy Sheriff Mathieson confirmed that the legal code cited in the complaint is correct; it is against the law (a misdemeanor) to bring a gun, taser, or stun gun to a public meeting in California.

The City Planner and the Planning Commission Chair have stated that they did not see and were not aware of the presence or display of a weapon at the Planning Commission meeting. Please see the attached statement (email) from Planning Commission Chair John Graves.

I asked the people filing the complaint to please encourage anyone who actually witnessed the event to communicate directly with me. A person who has requested anonymity (hereafter 'John Doe') subsequently spoke with me about the event, which they claim to have directly witnessed. 'John Doe' alleges that during a break in the meeting, amidst a variety of side conversations, Mr. Morgan removed a taser/stun gun type weapon from his pocket and made a comment to the effect of 'I came prepared'. 'John Doe' stated this was in the context of a discussion about opposition to Mr. Morgan's appointment to the Commission, and was not taken as a threat against anyone present. 'John Doe' stated that few people present would have seen it, due to the situation involved in the meeting break, but they thought Planning Commissioner Brett Gregory had also seen it. This description of events is consistent with that in the submitted complaint.

Mr. Morgan stated that he doesn't own a stun gun and never displayed one at the Planning or Council Meeting. Staff are aware that Mr. Morgan does own some sort of electric based self-defense weapon which he asked Deputy Mathieson to examine to see whether it was legal to bring to public meetings (it was not). Staff are not sure of the exact type or name for this device.

I subsequently spoke with Planning Commissioner Gregory, who told me that he observed Mr. Morgan place a stun-gun type weapon on the table during a break in the May 16th meeting and state something like 'I am ready and prepared'. Mr. Gregory's description of the incident was consistent with the description from the anonymous witness and the filed complaint.

Staff have not attempted to query every participant in the meeting, nor to collect written statements from each person named herein.

Related Recent Events:

Mr. Morgan, against the advice of City staff, chose to bring pepper spray (or mace?) to the June Planning Commission meeting and to a June Council meeting, and to carry it in a manner visible to the public. Staff's understanding is that is not illegal, but staff continue to advise against it out of concern that it is likely to be perceived as threatening and therefore may discourage public participation in open City meetings.

Conclusions

June Council Meeting Statement:

The statements at the June Council meeting are not in dispute. They were witnessed by the City Council and Mr. Morgan apologized for them at the time.


May Planning Commission meeting:

The events of the May Planning Commission meeting are in dispute. Mr. Gregory and 'John Doe' report directly observing the display of an electric stun-gun type weapon, consistent with the account in the complaint. The Planning Commission Chair and City Planner report that they saw no weapon of any kind. Mr. Morgan stated that he does not own and did not display a stun gun.

Next Steps:

1. This report concludes staff's response to the complaint.
2. The complainant has requested a law enforcement investigation. This report will be shared with the Sheriff's Office for their review and consideration.
3. Staff recommends the City Council consider whether to place this complaint and response on a future Council agenda for discussion. The City Council alone has the authority to appoint, remove, and provide direction to Planning Commissioners.

Sincerely,

A handwritten signature in cursive script, appearing to read "Daniel Berman".

Daniel Berman
City Manager

Cc (via email) : City Council
Planning Commission
City Planner
City Attorney
City Clerk
Deputy Luke Mathieson.

Attachments:

- 1) Complaint received via email June 19th
- 2) Planning Commission Chair email response to complaint

June 19, 2018

To: Trinidad City Council and Trinidad Planning Commission

Re: Planning Commission Mike Morgan

From: Kathleen Lake and Tom Davies residents of Trinidad

We are writing at this time to share our concerns regarding the behavior of Trinidad Planning Commissioner Mr. Mike Morgan who, on two separate occasions, and at two separate public meetings, appears to have violated ethics standards and possibly criminal laws. We have just become aware of these issues from other concerned residents in Trinidad who either were at the two meetings and witnessed these actions or residents who have also heard of these incidents and also have serious concerns. We did not personally attend either meeting in question. To our knowledge neither the City Council or the Planning Commission has directly considered these allegations in question or made any public statement regarding the problems that that they witnessed. At this time, and in light of the serious nature of the allegations, we are requesting that Mike Morgan be suspended from the the Planning Commission until further investigation of his actions and a determination is made in public as to the City Council's (CC) opinion and outcome of the investigation is made public.

At the last Planning Commission meeting in May 2018, it is alleged that during a conversation between the Planning Commissioners (PC), with the public present, PC Mr. Morgan entered into a discussion regarding the CC meeting where Mr. Morgan was appointed by the City Council to the Planning Commission position. During this CC meeting there were several members of the public, who spoke during the public comment period, and requested that the City Council not appoint Mr. Morgan for a variety of ethical reasons. During this conversation at the Planning Commission meeting, Mr. Morgan pulled a stun gun/taser from his pocket in full view of the public, apparently in order to show that he carried protection with him. The context of the conversation, combined with the the brandishing of the weapon, appear to be a violation of criminal law as it is illegal to carry a stun gun in places where public meetings are held*. Having a disagreement with someone over an issue is typical and expected in public meetings, however this level of conduct is outside not only of professional conduct, but also outside the law. This action is clearly outside ethical standards and may constitute a criminal act. This must be thoroughly investigated and the public assured that this is not acceptable behavior and will not be tolerated. It is our understanding that at no time during this meeting the Chairperson of the Planning Commission or any other member discussed this behavior or made any comment of the inappropriateness of the actions.

During the last City Council meeting on June 12, 2018, it is alleged that during public comments for an agenda item regarding implementing parking restrictions in front of Mr. Morgan's business, several members of the community wrote public comments in opposition of the Trinidad staff recommendation. One member of the public was identified by Mr. Morgan in his public comments in a derogatory and unfair manner when he reportedly stated that he was "sick

of this Kim Tays bullshit." This statement again intimidates the public from making comments, violating the rights of the public to be considered fairly even when disagreements arise.

Mr. Morgan has been a member of the Planning Commission for approximately one month and his behavior has clearly demonstrated that of possible criminal behavior and intimidation and bullying of the public who comment on issues that do not fit his agenda.

This type of deliberate or careless conduct, in both situations, endangers the safety of everyone and the creates a "toxic" problem of intimidating the public. The provocation or instigation of violence is grounds enough for immediate dismissal from public office. We are concerned that the Trinidad City Council and the Trinidad Planning Commission appear to have taken no steps to address this very serious situation. Mr. Morgan must not be allowed to participate in any further public duties until these allegations are fully investigated, and the City Council makes a public statement of the facts and the outcome.

Thank you,

Kathleen Lake

Tom Davies

It is illegal to carry or use a stun gun when you are in a secure area of an airport or in a passenger terminal in a harbor facility that hosts regular commuter operations; or in any state or **local government building; or in any meeting that is required by law to be open to the public. Peace officers and specified others are exempt from these rules. Violations of these rules are misdemeanors.*

(Ca. Penal Code § § 1715, 22620)

*Federal law defines brandished as, "with reference to a dangerous weapon (including a firearm) means that **all or part of the weapon was displayed, or the presence of the weapon was otherwise made known to another person, in order to intimidate** that person, regardless of whether the weapon was directly visible to that person. Accordingly, although the dangerous weapon does not have to be directly visible, the weapon must be present." (18 USCS Appx § 1B1.1)

<https://definitions.uslegal.com/b/brandished/>

*This complaint will be forwarded to the Humboldt County District Attorney's office.

From: Trinidad City Clerk
To: citymanager@trinidad.ca.gov
Subject: FW: Complaint: Planning Commissioner Mike Morgan
Date: Wednesday, June 20, 2018 1:51:09 PM
Importance: High

From: John G Graves <johng1949@suddenlink.net>
Sent: Tuesday, June 19, 2018 7:25 PM
To: 'Tom Davies & Kathleen Lake' <tomd.kathleenl@gmail.com>; 'Susan Rotwein' <srotwein@trinidad.ca.gov>; 'Dwight Miller' <trinidad.miller@gmail.com>; 'West Jack' <jandjwest@yahoo.com>; 'Baker Jim and Joan' <jjbakers@gmail.com>; 'Steve Ladwig' <smladwig@gmail.com>; 'Trinidad City Clerk' <cityclerk@trinidad.ca.gov>; Brett@saltystinidad.com; 'Diane Stockness' <diane.stockness@gmail.com>; 'Richard Johnson' <rfjbrr@gmail.com>
Cc: 'Trevor Parker' <tparker@shn-engr.com>; 'Trevor A. Parker' <trevor@streamlineplanning.net>
Subject: RE: Complaint: Planning Commissioner Mike Morgan
Importance: High

Tom and Kathleen.

I am chair of the Trinidad Planning Commission, and Mr. Morgan sat next to me during the entire meeting. I did not witness any of the actions your sources say occurred. Had anyone in the meeting, whether Commission member or member of the public, brandished a fire-arm I would have immediately admonished the individual and would have instigated action to assure no such display happened again. While I only recently assumed the role as Chair of the Commission, I served 6 terms as Chair of Arcata's Planning Commission, and take the role seriously. I have no qualms about calling for law enforcement back up in the case of someone attempting to disrupt a public meeting, and did so twice during my time in Arcata.

Again, I did not witness any of the actions you described at the last Planning Commission meeting, nor did I see any member of the public act as though something was amiss. Further, no member of the Commission commented to me after the meeting, nor did our staff member, Trevor Parker.

John Garland Graves
707-677-5179

From: Tom Davies & Kathleen Lake <tomd.kathleenl@gmail.com>
Sent: Tuesday, June 19, 2018 6:26 PM
To: Susan Rotwein <srotwein@trinidad.ca.gov>; Dwight Miller <trinidad.miller@gmail.com>; West Jack <jandjwest@yahoo.com>; Baker Jim and Joan <jjbakers@gmail.com>; Steve Ladwig <smladwig@gmail.com>; Trinidad City Clerk <cityclerk@trinidad.ca.gov>; johng1949@suddenlink.net; Brett@saltystinidad.com; Diane Stockness <diane.stockness@gmail.com>; Richard Johnson <rfjbrr@gmail.com>
Subject: Complaint: Planning Commissioner Mike Morgan

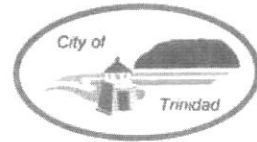
Dear Trinidad Public Officials,

Please find the attached complaint regarding Planning Commissioner Mr. Mike Morgan. Mr. Morgan's actions must be addressed immediately. Please respond to let us know you have received this complaint.

Regards,

Tom Davies
Kathleen

CITY OF TRINIDAD
P.O. BOX 390
TRINIDAD, CA 95570



CITIZEN COMPLAINT FORM

DATE: 8/6/18 TIME: 11:00 am
SUBJECT OF COMPLAINT: harassment by a planning commissioner
DETAILS OF COMPLAINT: see attached Mike Morgan

*** OPTIONAL INFORMATION ***

NAME: Dorothy Cox TELEPHONE: 707-677-3288
ADDRESS: 436 Ocean EMAIL: crabby2@suddenlink.net
SIGNATURE: Dorothy Cox REPLY REQUESTED: ☒ YES ☐ NO

NOTE: INFORMATION CONTAINED IN THIS FORM MAY BE SUBJECT TO REVIEW THROUGH THE PUBLIC RECORDS ACT

*** OFFICIAL USE ONLY ***

DATE & TIME COMPLAINT RECEIVED: 11:23 am 8/6/18 COMPLAINT # _____
COMPLAINT RECEIVED BY: Dan Bernin IN PERSON ☒ MAIL ☐ EMAIL ☐ TELEPHONE ☐
ACTION TAKEN: _____

This is an accounting of what happened on Friday August 3 at approximately 12:30 at Salty's Mike Morgan and Tyler came into Salty's. No one else was in the room when they came in. Mike brought in the Mad River Union and said he wanted to talk to Brett about someone whose name was in the article. (in thinking about it and reviewing the article Brett thinks he was referring to Elaine Weinraub.)

Mike began talking AT Brett Brett said things back to Mike like "it's not appropriate for you to be here,... this is my place of business,... I'd like you to leave,... I don't want to talk to you,...leave me alone".

Mike was relentless and he tried to bargain with Brett to get him to talk with him saying things like ..I'm not mad at you...I won't take action against you.....

Brett told him he wasn't interested in what he had to say.

He said to Brett " you are a liar" and Brett said "prove it"

Mike "postured" and raised his voice. Brett said Mike's aggression escalated and he slammed his hands on the glass counter and he said "fuck you" to Brett.

Brett said he stood up from his stool behind the counter and said "Fuck you"....."don't threaten me"..... and "leave right now!" He had asked Mike to leave at least four times already. Mike said, "you didn't ask me NICELY"

Brett said he said to Mike, .." Mike, would you *please* leave now"

A customer had come into the store during this time and he told Brett that he could tell Brett was in a bit of trouble with how Mike was behaving so instead of leaving during this verbal assault by Mike, he chose to stay and be there for Brett. He even mentioned after Mike left that perhaps he should get a restraining order against Mike.

This is a person that Brett knows and he would provide a statement if needed.

Brett has also reviewed the video in the shop and it shows the whole interaction. There is no audio.

Lorethy Cox



CODE OF ETHICS FOR TRINIDAD CITY COUNCIL AND PLANNING COMMISSION

PREAMBLE

The residents and businesses of Trinidad are entitled to have fair, ethical and accountable local government. Such a government requires that public officials:

- ❖ Comply with both the letter and the spirit of the laws and policies affecting operations of government.
- ❖ Be independent, impartial and fair in their judgement and actions.
- ❖ Use their public office for the public good, not for personal gain; and
- ❖ Conduct public deliberations and processes openly, unless legally confidential, in an atmosphere of respect and civility.

To this end Trinidad City Council has adopted a Code of Ethics as follows:

PUBLIC INTEREST

Recognizing the stewardship of the public interest must be their primary concern, Council members and Planning commissioners shall work for the common good of the people of Trinidad and not for any private or personal interest. Council members and commissioners must endeavor to treat all members of the public and issues before them in a fair and equitable manner.

COMPLY WITH THE LAW

Council members and Planning commissioners shall comply with the laws of the Nation, the State of California, and the City in performance of their public duties. These laws include those pertaining to conflict of interest, election campaigns, financial disclosures, employer responsibilities and open processes of government.

CONDUCT OF MEMBERS

Council members and Planning Commissioners shall refrain from abusive conduct, personal charges or verbal attacks upon the character or motives of other members, commissioners, staff or the public.

RESPECT FOR PROCESS

Council members and Planning Commissioners shall perform their duties in accordance with the processes and rules of order established by the City Council.

CONDUCT OF PUBLIC MEETINGS

Members shall prepare themselves on public issues by reading all the information available to them prior to the meeting where these issues will be addressed. Members shall listen attentively to public discussion before the body and focus on the business at hand.

DECISIONS

Decisions shall be based upon the merits and substance of the matter at hand. Differing points of view - either of other members or the public, shall be treated with respect.

COMMUNICATION

It is the responsibility of the Council members and Planning commissioners to publicly share substantive information that is relevant to the matter under consideration and which they may have received from other sources.

USE OF PUBLIC RESOURCES

Council members and Planning commissioners shall not take advantage of services or opportunities by virtue of their public office that are not available to the public in general. They should avoid any action that could be construed as, or create the appearance of, using public office for personal gain, including use of staff time, stationery, equipment or supplies, or other City facilities of resources to promote personal purposes.

PUBLIC ADVOCACY

Members shall represent the official policies and positions of the City Council and Planning Commission. When presenting their personal opinions, members shall explicitly state they do not represent the Council or the City.

CONFIDENTIAL INFORMATION

Council members and Planning commissioners shall respect and preserve the confidentiality of information provided to them concerning confidential matters of the City.

They must neither disclose confidential information without proper legal authorization nor use such information to advance the personal, financial or private interests of themselves or others.

CONFLICT OF INTEREST

In order to assure their independence and impartiality on behalf of the public good, members shall not use their official positions to influence government decisions in which they have a material financial interest or where they have an organizational responsibility or personal relationship which may give the appearance of a conflict of interest.

Council members and Planning commissioners need to be above suspicion. When a public official participates in a decision that does not fall within the specific statutory guidelines for conflicts of interest but still does not "look" or "feel" right, that public official has probably encountered "the appearance of impropriety". For the public to have faith and confidence that government authority will be implemented in an even-handed and ethical manner, public officials may need to step aside, for the good of the community, even though no technical conflict exists.

INDEPENDENCE OF THE PLANNING COMMISSION

Because of the value of the independent advice of commissions to the public decision-making process, members of the Council shall refrain from using their position to unduly influence the deliberations or outcomes of Planning Commission proceedings.

IMPLEMENTATION

Ethical standards shall be included in the regular orientations for newly elected and appointed officials. Members entering office shall sign a statement affirming they have read and understand the City of Trinidad Code of Ethics.

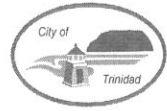
COMPLIANCE AND ENFORCEMENT

All members of the City Council and Planning Commission have the responsibility to intervene when actions of members that appear to be in violation of the Code of Ethics are brought to their attention. Any member may place an allegation of Ethics Code violation on the City Council agenda, and it shall always be placed first in order on the agenda.

The Council, by at least a 4/5 vote, may impose sanctions on members whose conduct does not comply with the City's ethical standards.

TRINIDAD CITY HALL
P.O. Box 390
409 Trinity Street
Trinidad, CA 95570
(707) 677-0223

Chi-Wei Lin, Mayor
Gabriel Adams, City Clerk



CITY OF TRINIDAD CODE OF ETHICS:

MEMBER STATEMENT

As a member of the Trinidad City Council or Planning Commission, I agree to uphold the Code of Ethics for elected and appointed officials adopted by the City and conduct myself by the following model of excellence. I will:

Recognize the worth of individual members and appreciate their individual talents, perspectives and contributions;

Help create an atmosphere of respect and civility where individual members, City staff and the public are free to express their ideas and work to their full potential;

Conduct my personal and public affairs with honesty, integrity, fairness and respect for others.

Respect the dignity and privacy of individuals and organizations;

Keep the common good as my highest purpose and focus on achieving constructive solutions for the public benefit;

Avoid and discourage conduct which is divisive or harmful to the best interests of Trinidad;

Treat all people with whom I come in contact in the way I wish to be treated;

I affirm that I have read and understood the City of Trinidad Code of Ethics.

Signature: _____

Date: _____

Title or Office: _____

From: **M Morgan** mmorgan.online@icloud.com
Subject: **Misconduct and Non-Infraction Complaints Against City Manager Dan Berman**
Date: July 25, 2018 at 5:48 PM
To: Trinidad City Clerk cityclerk@trinidad.ca.gov
Cc: Susan Rotwein srotwein@trinidad.ca.gov, Andrew Stunich ajs@perلمانstunichlaw.com, Dwight Miller trinidad.miller@gmail.com, Jack West jandjwest@yahoo.com, Jim & Joan Baker jjbakers@gmail.com, Steve Ladwig smladwig@gmail.com

MS

July 25, 2018

Misconduct and Non-Infraction Complaints Against City Manager Dan Berman

On Wednesday, June 27, 2018, City Manager Dan Berman committed 2 specific acts of misconduct against me.

1. Berman personally delivered a draft letter to my business which incorrectly reported my response to questions regarding false allegations made by some anonymous person. His letter included several inaccurate assessments and conclusions and recommendations as City Manager.
2. Berman's letter demonstrated his incompetence to appropriately reply to a third party complaint against me. At a subsequent meeting in his office, I requested he share his letter with our City Attorney and seek his council. It was during this meeting that Dan Berman did verbally attack me by angrily saying, and I quote .. "Fuck you Mike".

I believe Dan Berman is subject to appropriate disciplinary action. I expect corrective action be taken for his misconduct in item 2.

On Thursday June 28, 2018, City Manager Dan Berman and I had an informal conference call with our City Attorney. I agreed with our City Attorney suggestions, and Berman committed to showing me his revision of his draft letter.

On Saturday July 7, 2018, City Manager Dan Berman broke his agreement with me. Furthermore, Berman acted against our City Attorney's council regarding his letter. It was an inappropriate response to the situation and I will seek legal action against him.

Michael Morgan
560 Edwards Street
677-0840